

**SEALED**

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2021 NOV 10 PM 1:25

CLERK'S OFFICE  
AT BALTIMORE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL L. MCDONALD,**

**Defendant.**

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**CRIMINAL NO.**

**UNDER SEAL**

BY GR 21cr444 DEPUTY TTD

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**MOTION TO SEAL INDICTMENT**

The United States of America, by and through its undersigned attorneys, hereby moves this Honorable Court for an Order sealing the Indictment in the above-captioned matter, and in support thereof states:


1. On November 10, 2021, the Grand Jury returned an Indictment charging the above-named defendant with three counts of tax evasion in violation of 26 U.S.C. § 7201 and four counts of failure to file tax return in violation of 26 U.S.C. § 7203.

2. The government requests that the Indictment be sealed because the criminal investigation is ongoing, additional investigative steps are expected or underway, and the defendant is likely not aware of the existence or the scope of the investigation. Accordingly, premature disclosure of the criminal charges could endanger federal agents and compromise the ongoing federal investigation.

WHEREFORE, for the foregoing reasons, the government respectfully requests that the Indictment, along with this Motion and the Court's reasons for sealing, if made express in the Order, be placed under seal until further order of this Court.

Respectfully submitted,


Erek L. Barron  
United States Attorney



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Kathleen O. Gavin  
Assistant United States Attorney

ORDERED as prayed this 10 day of November, 2021.



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Honorable Thomas M. DiGirolamo  
United States Magistrate Judge